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ROBINSON, MCFADDEN & MOORE, P.C.
COLUMBIA, SOUTH CAROLINA

January 8, 2008

VIA ELECTRONIC FILING
HAND DELIVERED ORIGINALS

Mr. Charles Terreni, Chief Clerk of the Commission
Public Service Commission of South Carolina
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**Re: Application of Duke Energy Carolinas, LLC
for approval of Energy Efficiency Plan
Docket No. 2007-358-E**

Dear Mr. Terreni:

Enclosed for filing please find the following:

1. Duke Energy Carolinas' Responses to Southern Environmental Law Center's Interrogatories and Request for Production and Motion for Confidential Treatment of Selected Responses; and
2. Duke Energy Carolinas' Responses to Wal-Mart Stores East, LP's Data Requests and Motion for Confidential Treatment of Selected Responses.

We are electronically filing the "Public" versions in which confidential, proprietary information has been redacted. We are also hand delivering the "Public" versions. We are also filing under seal the "Confidential" versions which contain the information redacted in the "Public" versions.

Duke Energy Carolinas has provided copies of confidential responses to Southern Environmental Law Center, the Office of Regulatory Staff, S.C. Energy Users Committee, and Wal-Mart pursuant to separate Confidentiality Agreements. An original and two copies of each are included for filing. Please date-stamp the extra copies as proof of filing and return them with our courier.

This document is an exact duplicate, with the exception of the form of the signature, of the e-filed copy submitted to the Commission in accordance with its electronic filing instructions.

If you have any questions, please have someone on your staff contact me.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.


Frank R. Ellerbe, III

FRE/tch
Enclosures

c/enc: Catherine E. Heigel, Assistant General Counsel (via email and US Mail)
Nanette Edwards, Chief Counsel (via email and US Mail w/confidential
enclosures)
Scott Elliott, Esquire (via email and US Mail w/confidential enclosures)
J. Blanding Holman, IV, Esquire (via email and US Mail w/confidential
enclosures)
Gudrun Thompson, Esquire (via email and US Mail w/confidential
enclosures)
Robert E. Tyson, Jr., Esquire (via email and US Mail w/confidential
enclosures)
Alan R. Jenkins, Esquire (via email and US Mail w/confidential enclosures)
Jeremy Hodges, Esquire (via email and US Mail w/o confidential
enclosures)
James H. Jeffries, IV Esquire (via email and US Mail w/o confidential
enclosures)

STATE OF SOUTH CAROLINA

Application of

Duke Energy Carolinas, LLC
for Approval of Energy Efficiency Plan Including
an Energy Efficiency Rider and Portfolio of Energy
Efficiency Programs.

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

COVER SHEET

**DOCKET
NUMBER: 2007-358-E**

(Please type or print)

Submitted by: Bonnie D. Shealy

SC Bar Number: 11125

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

- ☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously
- ☒ Other: _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certificatio	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input checked="" type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other: Testimony of Stephen M. Farmer	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2007-358-E

January 8, 2008

In re:)	
Application of Duke Energy Carolinas, LLC)	DUKE ENERGY CAROLINAS'
For Approval of Energy Efficiency Plan)	RESPONSES TO WAL-MART
Including an Energy Efficiency Rider and)	STORES EAST, LP DATA
Portfolio of Energy Efficiency Programs)	REQUESTS AND MOTION FOR
)	CONFIDENTIAL TREATMENT
)	OF SELECTED RESPONSES
)	

PUBLIC VERSION
CONFIDENTIAL, PROPRIETARY INFORMATION
REDACTED

Duke Energy Carolinas, LLC ("Duke Energy Carolinas" or the "Company"), by and through the undersigned counsel, hereby submits its responses to the data requests of Wal-Mart Stores East, L.P. ("Wal-Mart") filed with the Public Service Commission of South Carolina (the "Commission") on December 19, 2007. The Company respectfully requests that the responses it identifies as confidential herein and all response schedules provided on compact discs included herewith be filed with the Commission under seal and maintained as confidential pursuant to Order No.: 2005-226, "ORDER REQUIRING DESIGNATION OF CONFIDENTIAL MATERIALS." The data responses designated herein as "Confidential" contain information that is proprietary and commercially sensitive, and if disclosed, could adversely affect the Company's ability to enter into arms-length purchased power and energy services transactions.

The Company requests, therefore, that the Commission grant its request for

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Wal-Mart Data Requests –Set No. 1
Duke Energy Carolinas' Responses

confidential treatment pursuant to 26 S.C. Code Ann. Regs. 103-804(Y)(2)(Cum. Supp. 2005). Duke Energy Carolinas has provided copies of all confidential responses to Wal-Mart pursuant to that certain Confidentiality Agreement by and between the Company and Wal-Mart, dated December 21, 2007. The Company has further provided copies of its confidential responses to the Office of Regulatory Staff, the South Carolina Energy Users Committee, and Southern Environmental Law Center / Southern Alliance for Clean Energy / Coastal Conservation League pursuant to separate Confidentiality Agreements entered into by and between Duke Energy Carolinas and these parties individually.

The Company responds as follows:

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REDACTED

WM 1-1. Response contains confidential information which is separately filed under seal and maintained as confidential pursuant to Order No. 2005-226 and the Confidentiality Agreements between the parties.

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Duke Energy Carolinas' Responses

Question Assigned to: Diane V. Denton, Director, Energy Efficiency Policy, and Theodore E. Schultz, Vice President, Energy Efficiency

WM 1-2. Please identify the individual programs that are expected to produce the Projected 2008 SC residential EE Impacts of 4,251,000 kWh and the Projected 2008 SC non-residential EE impacts of 2,053,000 kWh

RESPONSE:

Please refer to the testimony of Theodore E. Schultz, Section V. Energy Efficiency Program Descriptions. Further, see the Company's confidential response to WM 1-1(a) for a list of programs and WM 1-1(c) for an explanation regarding the partial year figures.

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REDACTED

WM 1-3. Response contains confidential information which is separately filed under seal and maintained as confidential pursuant to Order No. 2005-226 and the Confidentiality Agreements between the parties.

DOCKET NO. 2007-358-E
Wal-Mart Data Requests –Set No. 1
Duke Energy Carolinas' Responses

REDACTED

WM 1-4. Response contains confidential information which is separately filed under seal and maintained as confidential pursuant to Order No. 2005-226 and the Confidentiality Agreements between the parties.

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Wal-Mart Data Requests –Set No. 1
Duke Energy Carolinas' Responses

Question Assigned to: Diane V. Denton, Director, Energy Efficiency Policy

WM 1-5. As referenced on page 7, lines 14 through 17, of the Direct Testimony of Stephen Farmer, please provide the QF rates used to calculate Rider EE.

RESPONSE:

The QF rate schedule most recently approved by the PSC SC was sent via email from Diane Denton to David Ozment on December 20, 2007. The avoided capacity costs used to develop that QF rate were also used to develop Rider EE.

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Question Assigned to: Stephen M. Farmer, Consultant, Christopher M. Jacobi, Commercial Associate, Market & Financial Analysis, and Carol E. Shrum, Vice President, Rates

WM 1-6. As referenced on page 16, lines 8 through 21, of the Direct Testimony of Stephen Farmer:

- a. Does the calculation of Rider EE either include or constitute an earned return on avoided energy costs?
- b. If the response to (a) is yes, is that return the weighted cost of capital (and if not, what is that return)?
- c. Please provide the weighted cost of capital (or other return used) for the 2008 calculation.
- d. Does Duke Energy earn a return on energy costs incurred for utility-owned generation resources or on power purchase agreements?

RESPONSE:

- (a) No.
- (b) Not applicable.
- (c) The pre-tax weighted cost of capital used in the 2008 calculation is 13.68%.
- (d) The Company does not earn a return on expensed energy costs. It does earn a return on capitalized energy costs. The Company does not earn a return on purchase power agreements.

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Question Assigned to: Richard G. Stevie, PhD., Managing Director, Customer Market Analytics

WM 1-7. As referenced on page 11, lines 20 through 21, of the Direct Testimony of Richard Stevie, please describe whether a large customer, which implements a significant amount of energy efficiency on its own outside of incentive programs, would be defined as a "free rider" or "free driver" under the evaluation methodology of Save-A-Watt.

RESPONSE:

Energy efficiency actions adopted by customers prior to the initiation of Duke Energy incentive program offerings are neither free riders, nor free drivers. These actions simply reflect the natural market penetrations of existing energy efficiency measures. After Duke Energy incentive programs become available, two cases are possible. One, if the customer accepts the Duke Energy program incentive, and the customer would have adopted the measure without the incentive, that customer would be considered a free rider. And two, if, on the other hand, a customer does not ask for or receive the incentive, and an independent third party evaluation study determines that Duke Energy's program contributed to the adoption of the measure (e.g., the customer neglected to complete the incentive application or market availability of inefficient equipment dropped due to the demand for efficient equipment), then the customer would be considered a free driver.

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Question Assigned to: Richard G. Stevie, PhD., Managing Director, Customer Market Analytics, and Janice D. Hager, Managing Director, Integrated Resource Planning

WM 1-8. As referenced on page 13, lines 15 through 19, of the Direct Testimony of Richard Stevie, are the avoided costs included in the calculation of Rider EE the avoided hourly energy costs from the IRP? If yes, please define the relationship between the avoided hourly energy costs from the IRP and the avoided cost rates detailed in South Carolina Schedule PP.

RESPONSE:

The avoided costs included in the calculation of Rider EE are based upon the avoided hourly energy costs for the IRP. For future Riders, the Company will calculate the Rider EE avoided costs by running the IRP models with and without the proposed energy efficiency programs. For the current Rider, due to the timing of the development of the energy efficiency plan in advance of the completion of the 2007 IRP, the initial IRP-based hourly avoided energy costs were escalated based on the projected rate of increase for the cost of energy in the wholesale market.

The avoided energy costs used in the calculation of Rider EE originate with the IRP to ensure that the appropriate hourly energy savings proportions of peak and off peak avoided costs are consistent with the IRP. Since many EE programs are targeted specifically to higher avoided cost hours, it is important to reflect avoided costs at the hourly level versus a single peak or off peak system average.

The values used for avoided costs in Rider EE will differ from the avoided costs rates on Schedule PP. This is appropriate due to three factors. One, the energy savings load shape of the energy efficiency measure is neither the same shape nor magnitude of the system average load shape. Second, the hours in which the energy savings measure is activated is targeted toward higher avoided cost hours, and is almost never an 8760 hourly system average, or even a peak hour average. Some energy efficiency programs target the top 100 hours, some the top 500 to 1000 hours, and others target by season (e.g., efficient heat pumps). And, third, Schedule PP reflects average system avoided costs whereas Rider EE uses avoided costs specific to a measure or program. As a result, the load shape of the energy efficiency measure is not the same and the size of the energy efficiency effort being undertaken by the Company is not the same as what is used to calculate the avoided cost rates in Schedule PP.

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Question Assigned to: Raiford L. Smith, Director, Energy Efficiency Product Development, and Richard G. Stevie, PhD., Managing Director, Customer Market Analytics

WM 1-9. As referenced on page 18, lines 5 through 6, of the Direct Testimony of Richard Stevie, please describe Duke Energy's historic handling of energy efficiency programs that do not meet the RIM test.

RESPONSE:

In the early 1990s, the Company implemented and planned to implement a number of programs that did not pass the RIM test. In the mid-1990s, due to the prospect of retail competition, the abundance of base load generation, and the low cost of new peaking generation, Duke Energy Carolinas, along with many other utilities, scaled back its energy efficiency efforts. The Company did not implement any programs that failed RIM from that time until the present time. (The Company did implement some educational programs in response to the Commission Order on the merger with Cinergy to spend \$2 million on energy efficiency but did not perform the standard cost effectiveness tests on these programs.)

Duke Energy utilizes all cost-effectiveness tests (including UCT, TRC, RIM, societal, and participant) to determine if an energy efficiency or demand side management program should be pursued. At a minimum, a program must pass the participant test (which measures a customer's likelihood to adopt a program based on their payback through lower bills associated with their investment in efficiency) and UCT (which measures if the utility benefits are greater than the total program costs). Programs which pass these two tests but fail RIM (which measures the impact to all customer rates) are usually energy efficiency programs. The Company believes adoption of energy efficiency programs which fail RIM but pass Participant and UCT can still provide benefits to all customers because the program's benefits (avoided costs) are greater than the cost of the program. This result implies the Company is choosing a lower-cost mix of resources than it would have if it had only pursued RIM-passing programs.

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Question Assigned to: Richard G. Stevie, PhD., Managing Director, Customer Market Analytics

WM 1-10. As referenced on page 24, lines 15 through 17, of the Direct Testimony of Richard Stevie, please describe the process to adjust the load impacts of free riders and free drivers.

RESPONSE:

The impact of free drivers has not been included in the analysis of energy efficiency cost effectiveness. Independent third party impact evaluation studies will measure the potential existence of free drivers, if any, at a later time. The impact of free riders was incorporated in the analysis of energy efficiency cost-effectiveness. The estimate of free riders that was obtained from outside consultants, third party impact evaluation studies of Duke Energy programs in other jurisdictions, or historic experience within other utilities promoting similar programs. The free rider estimates were input directly into the DSMore model as a percentage of participants per year forecasted to be free riders. The impacts obtained from these free riders are not included in the overall energy savings, yet the costs incurred due to free riders are included as a cost against the program for evaluation of measure level cost-effectiveness.

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Question Assigned to: Stephen M. Farmer, Consultant

WM 1-11. As referenced on page 8, lines 13 through 15, of the Direct Testimony of Theodore Schultz, does the Save-A-Watt methodology allow Duke Energy to earn a return on avoided energy costs?

RESPONSE:

See response to WM 1-6(a).

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Question Assigned to: Christopher M. Jacobi, Commercial Associate, Market & Financial Analysis, and Raiford L. Smith, Director, Energy Efficiency Product Development

WM 1-12. As referenced on page 20, lines 14 through 15, of the Direct Testimony of Theodore Schultz:

- a. Is "Year 1" 2008?
- b. How many of the 180,000 system MWh are allocated to South Carolina?

RESPONSE:

- (a) Year 1 refers to the first full year (365 days) of the program from the date it is approved.
- (b) 24.1% of the residential and 30.17% of the non-residential system MWh are allocated to SC. This is equivalent to 46,375 MWh in year 1.

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REDACTED

WM 1-12 (c). Response contains confidential information which is separately filed under seal and maintained as confidential pursuant to Order No. 2005-226 and the Confidentiality Agreements between the parties.

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Duke Energy Carolinas' Responses

Question Assigned to: Diane V. Denton, Director, Energy Efficiency Policy

WM 1-13. As referenced on page 9, lines 21 and 22, of Exhibit No. 1 of the Direct Testimony of Theodore Schultz, what is the limit of the incentives available to each customer?

RESPONSE:

At this time, there is no limit on the overall number of incentives available to each customer.

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Duke Energy Carolinas' Responses

Question Assigned to: Janice D. Hager, Managing Director, Integrated Resource Planning

WM 1-14. As referenced on page 9, lines 9 through 15, of the Direct Testimony of Janice Hager, what is the result of the IRP analysis when the actual program costs are used?

RESPONSE:

Duke Energy Carolinas did not perform such a calculation.

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Duke Energy Carolinas' Responses

Question Assigned to: Janice D. Hager, Managing Director, Integrated Resource Planning

WM 1-15. As referenced on page 10, lines 11 through 17, of the Direct Testimony of Janice Hager, does the 2008 revenue requirement for Save-A-Watt reflect the total MW of capacity from energy efficiency in 2008 or the incremental capacity added to the previous 700 MW?

RESPONSE:

The 2008 revenue requirement for save-a-watt reflects the total MW of capacity from energy efficiency in 2008.

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Duke Energy Carolinas' Responses

Question Assigned to: Dwight L. Jacobs, Vice President, Franchised Electric & Gas Accounting

WM 1-16. As referenced on page 17, lines 2 though 5, of the Direct Testimony of Jane Sadowsky:

- a. What portion of the initial funding for the Save-A-Watt program in South Carolina will come from equity capital?
- b. What portion of the initial funding for the Save-A-Watt program in South Carolina will be debt financed?

RESPONSE:

For save-a-watt, the Company does not have specific project financing. As a company, we do not typically fund individual projects, rather the weighted cost of capital reflects how Duke Energy Carolinas funds projects.

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Duke Energy Carolinas' Responses

Question Assigned to: Diane V. Denton, Director, Energy Efficiency Policy, and Dwight L. Jacobs, Vice President, Franchised Electric & Gas Accounting

WM 1-17. As referenced on page 15, lines 1 through 10, of the Direct Testimony of Jane Sadowsky, please compare the financing of the Save-A-Watt program to that of a generation resource.

RESPONSE:

For large generation plants that require up-front capital, we likely would obtain financing. However, that is not necessary in the case of save-a-watt. Save-a-watt is funded out of working capital – see response to WM 1-16.

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Question Assigned to: Judah Rose, Consultant, and Raiford L. Smith, Director, Energy Efficiency Product Development

WM 1-18. As referenced on page 30, lines 17 through 18, of the Direct Testimony of Judah Rose, please compare the \$/MWh energy efficiency costs of the Save-A-Watt program in South Carolina to the reported national average. Please provide a complete derivation of the costs, including all assumptions.

RESPONSE:

For the \$/MWh energy efficiency costs of the Save-A-Watt program in South Carolina, see Confidential Response to WM 1-3. As to the basis for the national average energy efficiency costs discussed on p. 30, lines 17-18 of Mr. Rose's direct testimony, the principal source of the estimated costs is the 2006 ACEEE (American Council for an Energy-Efficient Economy) report, "A Nationwide Assessment of Utility Sector Energy Efficiency Spending, Savings and Integration with Utility System Resource Acquisition." As noted in the referenced testimony, however, there are several aspects of this data that skew the results and should therefore be noted, including:

- (1) the cost data is for the average cost of already achieved savings, not for incremental savings to be achieved in the future. Thus, the ACEEE results are at a lower cost than the cost to achieve new energy efficiency (as shown in Duke's information).
- (2) the vintage of the data is 2004, but Duke's information is current.
- (3) the underlying data is not uniformly developed with respect to either the costs (e.g. the treatment of overhead expenses), or the verification of savings in MWh. Instead, the primary data source for ACEEE reports is the Energy Information Administration (EIA) which has not adopted uniform reporting protocols.
- (4) the ACEEE data does not include low-income energy efficiency program spending and savings, but Duke's portfolio does include these programs. These programs are typically higher-cost than traditional energy efficiency.
- (5) the very low level of savings in MWh nationally and regionally supports the view that low-cost programs predominate, and hence efforts to increase MWh savings would have higher incremental costs.

According to ACEEE, the EE expenditures include both incentives and administrative costs. The ACEEE report states, "Utility spending is on 'ratepayer-funded energy efficiency' programs, or energy efficiency programs funded through charges included in customer utility rates or otherwise paid via some type of charge on customer bills. This includes both utility-administered programs and "public benefits" programs administered by other entities. We do not include data on separately funded low-income programs, load management programs, or energy efficiency research and development."

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Question Assigned to: Theodore E. Schultz, Vice President, Energy Efficiency, and Raiford L. Smith, Director, Energy Efficiency Product Development

WM 1-19. As referenced on page 20, lines 2 through 4, of the Direct Testimony of Jane Sadowsky, please detail how Save-A-Watt will shift the immediate burden of capital investment from the customer to the utility.

RESPONSE:

Save-a-watt has the potential to shift the immediate burden of capital investment from the customer to the utility because the utility is making a portion of the customer's investment in energy efficiency through the provision of incentives to customers to install more efficient equipment.

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Question Assigned to: Carol E. Shrum, Vice President, Rates

WM 1-20. As referenced on page 20, lines 20 through 21, of the Direct Testimony of Jane Sadowsky:

- a. Please provide the methodology by which the amounts invested will be put into rate base.
- b. Does the amount put into rate base include avoided energy costs?

RESPONSE:

- (a) The reference in this sentence to “rate base” is referring to the ability to collect from customers appropriate amounts based on the Rider EE (SC) calculation and the actual energy efficiency results achieved.
- (b) Rider EE (SC) rates will recover avoided energy costs as well as avoided capacity costs.

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Wal-Mart Data Requests—Set No. 1
Duke Energy Carolinas' Responses

REDACTED

WM 1-21. Response contains confidential information which is separately filed under seal and maintained as confidential pursuant to Order No. 2005-226 and the Confidentiality Agreements between the parties.

DOCKET NO. 2007-358-E
Wal-Mart Data Requests –Set No. 1
Duke Energy Carolinas' Responses

REDACTED

WM 1-22. Response contains confidential information which is separately filed under seal and maintained as confidential pursuant to Order No. 2005-226 and the Confidentiality Agreements between the parties.

DOCKET NO. 2007-358-E
Wal-Mart Data Requests –Set No. 1
Duke Energy Carolinas' Responses

Question Assigned to: Richard G. Stevie, PhD., Managing Director, Customer Market Analytics

WM 1-23 Please describe how Duke Energy incorporates the impacts of free rider ship in their program impacts and calculations.

RESPONSE:

See response to WM 1-10.

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Question Assigned to: Richard G. Stevie, PhD., Managing Director, Customer Market Analytics

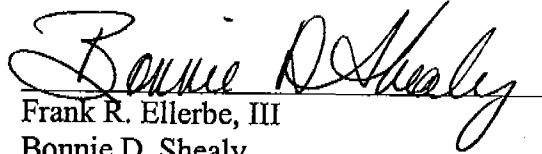
WM 1-24. Would Duke Energy claim energy savings from energy efficiency measures implemented by companies in which Duke energy efficiency incentives were not paid?

RESPONSE:

Duke Energy assumes the question refers to free driver effects. To the extent that independent third party impact evaluation studies determine that energy efficiency measures were implemented as a result of Duke Energy Carolinas' efforts, the kW and kWh achievements from the programs would be impacted and would impact the cost recovery.

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Duke Energy Carolinas' Responses

Respectfully submitted this 8th day of January 2008.



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ATTORNEYS FOR DUKE ENERGY
CAROLINAS, LLC

In Re:

Application of Duke Energy Carolinas, LLC for Approval of Energy Efficiency Plan Including an Energy Efficiency Rider and Portfolio of Energy Efficiency Programs

This is to certify that I, Leslie L. Allen, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **Duke Energy Carolinas, LLC's Responses to Southern Environmental Law Center Interrogatories and Requests for Production and Motion for Confidential Treatment of Selected Responses** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Scott A. Elliott, Esquire
Elliott & Elliott, PA
721 Olive Avenue
Columbia, SC 29205
(w/copies of confidential enclosures)

**J. Blanding Holman, IV, Esquire
Southern Environmental Law Center
200 W. Franklin Street, Suite 330
Chapel Hill, NC 27516
(w/copies of confidential enclosures)**

Robert E. Tyson, Jr., Esquire
Sowell Gray Stepp & Laffitte, LLC
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Jeremy C. Hodges, Esquire
Nelson Mullins Riley & Scarborough, LLP
P.O. Box 11070
Columbia, SC 29211
(w/o copies of confidential enclosures)

Dated at Columbia, South Carolina this 8th day of January, 2008.

A handwritten signature in cursive script, reading "Leslie Allen", written in dark ink.

Leslie L. Allen